

UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

In the Matter of the Search of)

(Briefly describe the property to be searched)
(or identify the person by name and address))A dark purple 1997 Mercedes E420 with)
Illinois registration EG30741 , more fully)
described in Attachment A)

Case No.

23-M-556 (SCD)

WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search and seizure of the following person or property located in the Eastern District of Wisconsin

(identify the person or describe the property to be searched and give its location):

see Attachment A.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal (identify the person or describe the property to be seized):

see Attachment B.

YOU ARE COMMANDED to execute this warrant on or before 1-9-24 (not to exceed 14 days)

☐ in the daytime 6:00 a.m. to 10:00 p.m. ☒ at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to Stephen C. Dries.

(United States Magistrate Judge)

☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box)☐ for days (not to exceed 30) ☐ until, the facts justifying, the later specific date of

Date and time issued:

12-27-23. 12:45 pm

Judge's signature

City and state:

Milwaukee, WI

U.S. Magistrate Judge Stephen C. Dries

Printed name and title

Return		
Case No.:	Date and time warrant executed:	Copy of warrant and inventory left with:
Inventory made in the presence of :		
Inventory of the property taken and name(s) of any person(s) seized:		
Certification		
<p>I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.</p> <div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="width: 30%;"> <p>Date: _____</p> </div> <div style="width: 60%;"> <p style="text-align: center;">_____</p> <p style="text-align: center;"><i>Executing officer's signature</i></p> <p style="text-align: center;">_____</p> <p style="text-align: center;"><i>Printed name and title</i></p> </div> </div>		

ATTACHMENT A

A dark purple 1997 Mercedes E420 with Illinois registration EG30741 and VIN WDBJF72F4VA135401, including the trunk and any and all compartments and closed containers therein.

ATTACHMENT B

LIST OF ITEMS TO BE SEIZED

Evidence, instrumentalities, fruits and contraband concerning violations of Title 18, United States Code, Sections 1343 and 1344, as follows:

- a. United States currency and/or coins;
- b. Documents including receipts containing names, nicknames, telephone numbers, and other information about Credit Union A customers;
- c. Any and all debit or credit cards, whether blank or containing information, and any devices used to encode or encrypt debit or credit cards;
- d. Cell phones, computers, laptops, storage devices or other electronic devices (the contents of which will not be searched unless appropriate authority is obtained);
- e. Indicia of ownership including records, and personal effects evidencing the user(s) of the **Subject Vehicle**;
- f. DNA including blood or blood trace evidence, fibers, hairs, hair fibers, bodily fluids, and trace elements of bodily fluids;
- g. Latent fingerprints and palm prints;
- h. Articles of clothing, including any type of face mask, and jewelry;
- i. Skimming devices and/or devices that appear to be skimming devices including any long, metal objects; and
- j. Any controlled substances.

AFFIDAVIT

I, Adam Wolgast, being duly sworn, state as follows:

1. I am a detective with the Loves Park, Illinois, Police Department and have been so employed since March 2012. I am currently assigned as a Task Force Officer with the Federal Bureau of Investigation, Safe Streets Task Force since approximately September 2020.

2. As part of my duties as an FBI Task Force Officer, I investigate criminal violations relating to white collar crime, including mail, wire, and bank fraud. I have participated in numerous criminal investigations including violent crime, fraud, theft, and narcotics trafficking. I have participated in the execution of multiple federal and state search warrants.

3. This affidavit is made in support of an application for a warrant to search a dark purple 1997 Mercedes E420 with Illinois registration EG30741 and VIN WDBJF72F4VA135401, described further in Attachment A (the “**Subject Vehicle**”), for evidence, instrumentalities, fruits, and contraband described further in Attachment B, concerning wire and bank fraud offenses, in violation of Title 18, United States Code, Sections 1343 and 1344.

4. The statements in this affidavit are based on my personal knowledge, and on information I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts. Because this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth facts

that I believe are sufficient to establish probable cause to believe that evidence, instrumentalities, fruits, and contraband of violations of Title 18, United States Code, Sections 1343 and 1344, (“**Subject Offenses**”) are located in the **Subject Vehicle**.

I. FACTS SUPPORTING PROBABLE CAUSE TO SEARCH

A. Background

5. On multiple occasions in September and October 2023, Personal Teller Machines (“PTMs”) located at Credit Union A located in Loves Park, Rochelle, and Machesney Park, Illinois, were illegally accessed by several unidentified individuals using skimming devices placed onto and/or into the PTMs.¹ Once inserted or placed on the PTMs, the skimming devices were used to obtain private account information from individual accounts stored in the PTMs.² This account information was later placed on debit cards and utilized to retrieve United States currency from the PTMs in October 2023. In total, Credit Union A lost \$489,890 in cash withdrawals physically stolen from the PTMs at these three locations.

B. Initial Report

6. On or about October 10, 2023, the Loves Park Police Department responded to Credit Union A in Loves Park, Illinois, in response to a theft.

¹ A PTM is a self-service kiosk specifically designed for bank branches to automate in branch transactions. It provides customers with an advanced digital banking experience, offering much more functionality than ATMs such as flexibility in cash withdrawals, deposits, and transfers, and allows the customer to make loan payments, cash checks, and prints official checks. See <https://www.connexcu.org/home/fiFiles/static/documents/PTMFAQ.pdf>.

² A skimming device or a skimmer is a device installed on or within legitimate card readers that collects card numbers. This information that is obtained is later used to clone cards or make fraudulent purchases. See <https://www.pcmag.com/explainers/how-to-spot-and-avoid-credit-card-skimmers>.

Investigating officers met with Individual A, vice president of Credit Union A, who indicated that starting at approximately 4:00 a.m. on October 8, 2023, several withdrawals were made at the PTMs at the Loves Park location. Individual A indicated the PTMs can only be accessed with a debit card and a PIN or by inputting the customer account and social security numbers. Individual A also indicated that Credit Union A's branch locations in Rochelle, Illinois, and in Machesney Park, Illinois, had also reported that customer accounts had been hacked and that United States currency had been stolen from the PTMs at those locations during the same time frame. Video camera footage from Credit Union A at all three locations was retrieved and tendered to investigating agents.

C. Credit Union A in Loves Park, Illinois

7. Video surveillance footage obtained for Credit Union A's Loves Park location showed that on or about October 8, 2023, at approximately 4:30 a.m., two individuals, wearing black balaclavas arrived in a tan/light colored Nissan Altima with a partially visible temporary license plate reading, "120AB."³ The driver remained in the car, pulled up to one of the PTMs on site, and started to withdraw cash using debit style cards by what appeared to be inserting and reinserting several different cards into the PTM. The passenger then exited the car and approached a different PTM located on site and withdrew cash using debit style cards by inserting and reinserting the cards into the PTM. Both suspects interacted with the PTMs for

³ Upon further investigation, I learned that the full temporary license plate number associated with the Nissan Altima was "120AB899." The Nissan Altima has not been located by law enforcement as of this writing.

approximately 15 minutes before leaving.⁴

8. The video camera footage also revealed that at approximately 6:55 a.m., a Buick Lucerne with Illinois registration ED82519,⁵ pulled up to one of the PTMs on site. The driver's face was covered with a black balaclava mask. The driver withdrew cash from the PTM using multiple debit style cards and gave the cash to the passenger. Soon after the Buick Lucerne arrived, a Nissan Cube, with Illinois temporary registration and a partially viewable plate number,⁶ pulled up to another PTM on site. The video showed the driver of the Nissan Cube, whose face was also covered with a black balaclava mask, withdraw cash from the PTM by inserting and reinserting several debit style cards into the PTM. The Buick Lucerne and Nissan Cube left momentarily due to an unrelated car pulling up behind the Buick Lucerne and using the PTM. Shortly after the unrelated car left the PTM, both the Buick Lucerne and Nissan Cube returned and began accessing the PTMs for the next five minutes and then departed.

9. At approximately 7:15 a.m., the video surveillance footage showed that the Buick Lucerne and Nissan Cube returned for a third time on October 8, 2023. The passenger in the Buick Lucerne exited the car and walked over to the Nissan

⁴ The video camera footage recorded a constant time of 4:30 a.m., even though the suspects were at the PTMs for at least 15 minutes.

⁵ Upon further investigation, the Buick Lucerne was located on or about November 14, 2023, in Belvidere, Illinois. A state search warrant was obtained, the car was processed for evidence, and the results remain pending.

⁶ Upon further investigation, I learned that the temporary registration on the Nissan Cube was 120AB898. The Nissan Cube was later located on or about October 17, 2023, abandoned in Loves Park, Illinois. A state search warrant was obtained, the car was processed for evidence, and results remain pending.

Cube. The passenger appeared to be female, was wearing dark clothing, and wore a Covid-style mask covering her face. The suspect drivers of both the Buick Lucerne and Nissan Cube appeared to be the same individuals who accessed the PTMs earlier that morning. During the time that the suspects were at the PTMs, they continuously accessed the PTMs and withdrew cash by inserting and reinserting debit style cards into the PTMs multiple times.

D. Credit Union A in Machesney Park, Illinois

10. I also reviewed video surveillance camera footage obtained from Credit Union A's Machesney Park, Illinois location. On or about September 19, 2023, at approximately 7:23 a.m., the **Subject Vehicle**, pulled up to one of the PTMs located on site. The **Subject Vehicle** appeared to be occupied by at least two individuals, a driver and a back seat passenger. The driver was wearing a black balaclava covering his/her face. The passenger appeared to access the PTM by inserting and reinserting many different debit style cards into the PTM continuously for several seconds. At approximately 7:25 a.m., the passenger appeared to apply a thin, shiny, object approximately one foot in length believed to be a skimming device to the PTM. Shortly thereafter, the driver appeared to take a photograph of the PTM with the affixed skimming device with a cellular phone and drove away.

11. I observed video surveillance footage from September 20, 2023 as well. On this date, at approximately 7:29 a.m., the **Subject Vehicle** pulled up to one of the PTMs at the Credit Union A Machesney Park location. There appeared to be at least three occupants in the **Subject Vehicle**, the driver and two backseat

passengers. The driver wore a Covid-style mask while the passenger wore a black balaclava covering his/her face. The passenger appeared to place a debit card into the PTM, and then took an object that appeared to be a long metal rod, like the object used on September 19, 2023, and affixed it onto the PTM. The video stopped prior to the vehicle leaving and the next video clip obtained from Credit Union A resumed at approximately 7:57 a.m. At that time, I observed the **Subject Vehicle** pull up to the other PTM on site. Based upon their clothing, the driver and passenger appeared to be the same individuals. The video showed the passenger inserting and reinserting a debit type of card into the PTM several times, then flipping the card around and repeating the same process. The **Subject Vehicle** drove away when an employee of Credit Union A came into work for the day.

12. On or about October 8, 2023, at approximately 4:28 a.m., a Nissan Cube, appearing to be the same car that was captured on the video surveillance cameras at the Loves Park location, pulled up to one of the PTMs located on site. At that time, the passenger, who was wearing dark clothing and a black balaclava approached the PTM. The passenger inserted debit style cards into the PTM, used the keypad, and withdrew cash. The passenger went back to the Nissan Cube and gave the cash to the back seat passenger who appeared to be a Hispanic female wearing a Covid-style mask. The passenger retrieved more debit cards from this female passenger and reapproached the PTM to withdraw more cash. The passenger followed this pattern several times. At the same time the passenger was accessing one PTM, the driver of the Nissan Cube was accessing the other PTM on site. The driver was also wearing

dark clothing and a black balaclava covering his/her face. Similarly, the driver accessed the PTM using debit style cards and withdrew cash and handed the cash to the female passenger seated in the back. The Nissan Cube left Credit Union A at approximately 5:19 a.m.

E. Credit Union A in Rochelle, Illinois

13. I also obtained and reviewed video surveillance from Credit Union A's Rochelle, Illinois location. The video surveillance showed that on or about October 4, 2023, at approximately 6:09 a.m. a dark colored sedan, which appeared to be the Buick Lucerne as depicted in the Loves Park surveillance, pulled up to one of the PTMs located on site. There were three occupants in the car, two of which appeared to be male and one that appeared to be female, and all were wearing black Covid-style masks over their faces. The driver and the female back passenger utilized cell phones. The male back passenger exited the car and stood by the PTM. At approximately 6:12 a.m. the driver passed what appeared to be a long, metal rod to the male as he stood next to the PTM. The male by the PTM appeared to place the object up near the face of the PTM. He then got back into the car and the drove away.

14. I also observed video surveillance from on or about October 6, 2023, from the Rochelle location. A dark colored sedan, which appeared to be the Buick Lucerne discussed above, drove into the parking lot of Credit Union A at approximately 6:16 a.m. The car pulled up to the PTM and the driver was wearing a black Covid-style mask. The driver took what appeared to be a long metal rod and placed it near or against the face of the PTM until he drove away at approximately 6:19 a.m.

15. I further observed video surveillance from on or about October 8, 2023, from the Rochelle location. Beginning at approximately 4:11 a.m., a car appearing to be the same Buick Lucerne pulled up to the PTM. There were at least two occupants in the car and the driver was wearing a black balaclava to cover his/her face. The video showed the passenger appearing to hand debit style cards to the driver, who then appeared to put them into the PTM. The driver obtained cash from the PTM and handed it to the passenger repeatedly.

F. Identification and Location of the Subject Vehicle

16. On or about October 20, 2023, I conducted a registration check on the **Subject Vehicle** and learned that it returned to a “Rosi Mateo” with a registered address of 514 N. Lawler Avenue, Chicago, Illinois 60644 (the “Lawler address”). On or about November 27, 2023, I contacted the Chicago Police Department and learned that they had no call history for the past two years at the Lawler address and further that there was no record of “Rosi Mateo” in their system. I later drove to the Lawler address and observed that the residence was vacant and spoke with Neighbor A, who indicated that the Lawler address had been vacant for approximately one year. Neighbor A further indicated that he/she did not know anyone named “Rosi Mateo” and was not familiar with the **Subject Vehicle** associated or parked at the Lawler address. I called the Winnebago County Records Division and requested that they put the **Subject Vehicle** into their database as a suspect vehicle.

17. On or about December 5, 2023, I learned that the **Subject Vehicle** was purchased by “Rosi Mateo”, listing the Lawler address, and a date of birth of October

10, 2001, from Eagle Auto Sales in Houston, Texas, on or about September 12, 2023.⁷

I attempted to call a phone number associated with Eagle Auto Sales, however, the individual who answered the phone did not speak English and hung up the phone.

18. I learned that on or about November 16, 2023, the West Allis, Wisconsin Police Department made a traffic stop of a Buick Skylark with Illinois registration EG30741, the same registration that was associated with the **Subject Vehicle**. The driver indicated that he purchased the Skylark through Facebook marketplace on November 8, 2023, and did not want to purchase registration for the Skylark, so he went to Auto Scrap Recyclers located at 3800 W. Mill Road Milwaukee, Wisconsin 53209, found the **Subject Vehicle**, removed the Illinois license plate with registration number EG30741 and placed it on the Skylark.

19. I subsequently contacted Auto Scrap Recyclers and learned that the **Subject Vehicle** had been towed to their location by Towing Company A. I learned the **Subject Vehicle** was left abandoned in a parking lot located at a golf course in Franklin, Wisconsin, on or about September 30, 2023. I also learned that the other Illinois license plate with registration number EG30741 was located inside the **Subject Vehicle** after it was observed through the window by a Franklin Police Officer. A Franklin Police Department K9 was called to the scene and alerted on the **Subject Vehicle** for the probable presence of an odor of a narcotic. The **Subject Vehicle** was subsequently searched, however, the trunk was not accessible. Despite


⁷ I conducted a check on that name and address, and it came back “no record,” therefore, I believe that this is a fictitious name associated with the address.

numerous attempts, no one has claimed or attempted to recover the **Subject Vehicle**, therefore, on or about October 25, 2023, the **Subject Vehicle** was towed and still remains in a secure location at Auto Scrap Recyclers located at 3800 W. Mill Road Milwaukee, Wisconsin 53209.

II. CONCLUSION

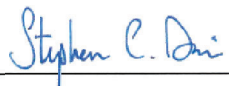
20. Based on the above information, I respectfully submit that there is probable cause to believe that wire and bank fraud offenses, in violation of Title 18, United States Code, Sections 1343 and 1344, have been committed, and that evidence, instrumentalities, fruits, and contraband relating to this criminal conduct, as further described in Attachment B, will be found in the **Subject Vehicle**, as further described in Attachment A. I therefore respectfully request that this Court issue a search warrant for a dark purple 1997 Mercedes E420 with Illinois registration EG30741 and VIN WDBJF72F4VA135401, more particularly described in Attachment A, authorizing the seizure of the items described in Attachment B.

FURTHER AFFIANT SAYETH NOT.



Adam Wolgast
Task Force Officer
Federal Bureau of Investigation

Sworn to and affirmed by telephone 27th day of December, 2023



Honorable Stephen C. Dries
United States Magistrate Judge

ATTACHMENT A

A dark purple 1997 Mercedes E420 with Illinois registration EG30741 and VIN WDBJF72F4VA135401, including the trunk and any and all compartments and closed containers therein.

ATTACHMENT B

LIST OF ITEMS TO BE SEIZED

Evidence, instrumentalities, fruits and contraband concerning violations of Title 18, United States Code, Sections 1343 and 1344, as follows:

- a. United States currency and/or coins;
- b. Documents including receipts containing names, nicknames, telephone numbers, and other information about Credit Union A customers;
- c. Any and all debit or credit cards, whether blank or containing information, and any devices used to encode or encrypt debit or credit cards;
- d. Cell phones, computers, laptops, storage devices or other electronic devices (the contents of which will not be searched unless appropriate authority is obtained);
- e. Indicia of ownership including records, and personal effects evidencing the user(s) of the **Subject Vehicle**;
- f. DNA including blood or blood trace evidence, fibers, hairs, hair fibers, bodily fluids, and trace elements of bodily fluids;
- g. Latent fingerprints and palm prints;
- h. Articles of clothing, including any type of face mask, and jewelry;
- i. Skimming devices and/or devices that appear to be skimming devices including any long, metal objects; and
- j. Any controlled substances.